

# EXHIBIT 17

**NETWORK DEPOSITION SERVICES**  
**Transcript of David Voye 30 (b) (6)**

1

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE WESTERN DISTRICT OF PENNSYLVANIA

3 - - -  
4 DONALD J. TRUMP FOR )  
PRESIDENT, INC., et al., )  
5 )  
Plaintiffs, )  
6 )  
vs. ) No.  
7 ) 2:20-cv-966-RN  
KATHY BOOCKVAR, et al., )  
8 )  
Defendants. )  
9 - - -

10 Videotape Video Conference 30(b) (6) Deposition of  
11 ALLEGHENY COUNTY BOARD OF ELECTIONS  
DAVID VOYE, Designated Deponent

12 Tuesday, September 29, 2020  
13 - - -

14 The videotape video conference deposition of  
15 DAVID VOYE, called as a witness by the plaintiffs,  
pursuant to notice and the Federal Rules of Civil  
16 Procedure pertaining to the taking of depositions,  
taken before me, the undersigned, Lance E. Hannaford,  
17 Notary Public in and for the Commonwealth of  
Pennsylvania, at 2568 Aldon Drive, Sewickley,  
18 Pennsylvania 15143, commencing at 12:30 o'clock p.m.,  
the day and date above set forth.

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21 NETWORK DEPOSITION SERVICES  
SUITE 1101, GULF TOWER  
22 PITTSBURGH, PENNSYLVANIA  
866-565-1929  
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24  
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16

1 because some precincts may be co-located in the same  
2 building?

3 A Yes.

4 Q Does Allegheny County intend to have any  
5 satellite or pop-up precincts available?

6 A We intend on having eight additional  
7 election offices.

8 Q Will those eight additional election  
9 offices also be -- will function as a voting precinct?

10 A People will be able to go into these  
11 locations, apply for either a mail-in or absentee  
12 ballot, and have their application processed there,  
13 and vote a paper ballot there.

14 Q Will these individual offices be manned  
15 offices?

16 A Yes.

17 Q What is the current plan for staffing of  
18 those additional offices?

19 A These additional offices will be staffed by  
20 county employees.

21 Q How many poll workers will Allegheny County  
22 require for the upcoming general election?

23 A Hopefully, we would like to have 65, 66  
24 hundred poll workers.

25 Q Are you including county employees who will

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24

1       boxes for the return of absentee or mail-in ballots?

2           A       At the additional voting locations, voters  
3       will be to return voted ballots.

4           Q       I apologize, we are still receiving some  
5       extraneous or ambient noise or information. Looks  
6       like it is coming from someone named "rosemana" maybe.

7                   Thank you very much. That helped.

8                   Other than the drop boxes that Allegheny  
9       County plans to use at these eight additional  
10      satellite offices, do you intend to use drop boxes at  
11      any other location?

12                  MR. OPSITNICK: Objection. Mr. Voye did  
13       not testify as to drop boxes. I think that was  
14       in our discovery responses.

15                  MR. WINKLOSKY: I apologize if I am  
16       unartfully phrasing my question.

17           Q       Can you explain the -- if there are going  
18       to be any unmanned locations for the return of mail-in  
19       ballots?

20           A       There will not.

21           Q       So as your counsel just mentioned,  
22       Allegheny County does not plan to use drop boxes; is  
23       that right?

24           A       We intend to use return ballot locations.

25           Q       And those return ballot locations are those

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25

1       eight additional offices that will be manned by county  
2       employees; is that right?

3           A       Correct.

4           Q       Is there going to be any signage up at  
5       those eight locations discussing or addressing the use  
6       of third party delivery of ballots, or return of  
7       ballots?

8           A       Instructions will be given to the voters by  
9       the employees.

10          Q       And what will those instructions be?

11          A       When a voter comes in, they will be asked  
12       if that is their ballot. They will be asked if they  
13       signed their ballot. The voter will -- the clerk will  
14       take the ballot from the voter, and drop it in a  
15       secure box.

16          Q       Other than that face to face interaction  
17       with the county employee and the voter, is the county  
18       planning on putting up any signs or anything  
19       reflecting that same information?

20          A       That has not been discussed as of yet.

21          Q       Will these locations have any type of video  
22       surveillance, or will they strictly be manned by  
23       county employees?

24          A       I think they will just be strictly manned  
25       by county employees.